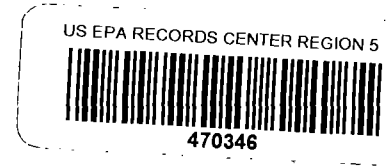




**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

**REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, ILLINOIS 60604**



REPLY TO THE ATTENTION OF: SR-6J

March 28, 2011

Thomas W. Steib  
Operations Manager  
Detrex Chemicals Division  
Elco Corporation  
1100 N. State Road  
Ashtabula, OH 44004

Re: Interim Operation and Maintenance Manual  
Detrex RD/RA Source Control Area, URS, Inc., June 2008  
Proposed Recovery Trench Option for Enhanced Fluid Recovery

Dear Mr. Steib:

The U.S. Environmental Protection Agency (EPA) recognizes the continuing technical challenges Detrex has faced in attempting to optimize its source area DNAPL extraction system. The Operation and Maintenance Manual has two proposals that have not yet been implemented to address the DNAPL source area. First, Section 3.1.5 of the O&M Manual proposed adding an additional transect of pre-packed 3" recovery wells. These new wells were never installed. A work plan that outlines the installation of these wells along the northern border of the facility should be prepared and provided to EPA by May 1, 2011.

The O&M Manual also proposed a DNAPL Recovery Trench as an option to installing more recovery wells. At our February 2011 meeting in Cleveland, you stated that Detrex was interested in moving forward with the trench option and if EPA could provide the necessary regulatory clarification regarding the handling of the excavated material.

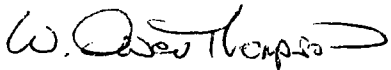
We have consulted with staff in our Land and Chemicals Division about this issue and RCRA Land Disposal Restrictions will not be triggered if the following conditions are met:

1. There needs to be an affirmative determination that the materials are remediation waste.
2. The waste material must be kept within the area of contamination.
3. The waste material must be controlled so as to pose no risk of migration.

Provided that you can comply with those conditions, your request to proceed with the recovery trench option is approved. Please provide EPA with a work plan before proceeding with any field work.

I can be reached by phone at 312 886-4843 if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "W. Owen Thompson". The signature is fluid and cursive, with a long horizontal stroke at the end.

W. Owen Thompson  
Remedial Project Manager  
Superfund Division

cc: Peter Felitti, U.S. EPA C-14J  
William Earle, SulTRAC  
Robert Currie, Detrex  
Martin Schmidt, URS